

**IN THE UNITED STATES BANKRUPTCY COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA**

In re: U LOCK INC. a/k/a	)	
U-LOCK INC.	)	Bank. 22-20823-GLT
	)	
Debtor.	)	Chapter 7
	)	
-----	)	
CHRISTINE BIROS,	)	
	)	
Movant,	)	
	)	
v.	)	
	)	
SHANNI SNYDER,	)	
	)	
Respondent.	)	

**REPLY TO RESPONSE TO STATEMENT OF NON-OBJECTION**

Alleged Debtor U Lock Inc. (“U Lock”), by and through its undersigned counsel,

Replies to the Statement of Non-Objection

1. The problem with Christine. Biros’ proposed Order is two-fold: (1) Blocking access to the tenants, all of whom have valid leaseholds (some verbal, some written, and some simply squatting) will expose U Lock to liability and Biros is not offering indemnification for their proposed “lock out.” Like the state court action, they propose to block access without first affording notice and an opportunity to be heard when they know that all occupants are entitled to due process; (2) The language in paragraph one is simply a disguised ejectment. There is no other way to describe it; and (3) As to the vehicles, U Lock needs the police to approve the move by tagging the cars, so its impossible to set a time limit except to say U Lock will remove them within 10 days of approval to do so. U Lock has no objection to Ms. Biros acting to speed up the police; and (4) The rest of the matters are fully encompassed by U Lock’s Statement of Non-Objection. It allows access to test and plan for remediation

of alleged contamination issues that spanned decades.

2. While U Lock disagrees with the narrative proffered by counsel for Christine Biros, it serves no purpose for Alleged Debtor to respond about the attempt to mediate other than to say U Lock acted in good faith, it sent an email to counsel identifying the issues listed above.
3. U Lock filed the Statement of Non-Objection to make clear U Lock would not be objecting, appealing, or litigating the issues as stated. It was not meant to suggest that this Court has no authority, has limited authority, etc.; we simply removed objections to most of the true issues.

Respectfully submitted,

/s/ J. Allen Roth, Esq.

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